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January 14, 2002

Gloria Blue, Executive Secretary
Trade Policy Staff Committee
Office of the U.S. Trade Representative
600 17th, Street, N.W.
Washington, D.C. 20508

Re: Steel – Investigation No. TA-201-73; WELDOX Product Exclusion Request

Dear Ms. Blue:

Grove Worldwide understands that the Office of the U.S. Trade Representative (USTR) is considering legislation that would impose tariffs on certain imported steel products. As a domestic OEM of mobile hydraulic cranes and aerial work platforms that require large quantities of quality steel to produce, Grove is very concerned about the impact such legislation would have on our ability to compete effectively in the world marketplace and maintain our existing level of employment in the U.S.

Our company has made great strides in the past few years to improve competitiveness and strengthen our position globally. We rely heavily on our ability to procure quality products from the most competitive sources worldwide. For example, Grove purchases high strength alloy steel plate for our products. Many of our unique applications require the use of WELDOX High and Ultra High-Strength Structural Plate with Yield Strengths from 100 ksi to 140 ksi. WELDOX High and Ultra High-Strength Structural Plate is manufactured by HARDOX a Division of SSAB Swedish Steel Group. To date HARDOX/SSAB is the only supplier of WELDOX High and Ultra High-Strength Plate capable of meeting our stringent production specifications. This product is of superior quality and value, possessing excellent mechanical and physical properties. No comparable product of similar quality and value is available domestically.

Accordingly, should the USTR recommend passage of such legislation, we ask that the following products be excluded from any safeguard measures imposed by the President:

Weldox 700
Weldox 900
Weldox 960

Weldox 1100

Grove believes that establishing high quotas or high duties on these products would benefit no one in the domestic industry, and would only serve to force U.S. purchasers to pay a higher price or preclude their buying the materials necessary to compete effectively in steel intensive manufacturing operations such as ours.

We appreciate your consideration to our viewpoint expressed above.

Very truly yours,

Alan E. Antoniewicz
Sr. Vice President - Operations
Grove Worldwide, Inc.